

CLARKSON & FORD CO.

Industrial Lubricants since 1883

October 27, 1995

30 Industrial West
Clifton New Jersey 07012
Phone (201) 777-0300
FAX (201) 777-3275

Joseph Cosentino, OSC
Removal Action Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Avenue
Edison, NJ 08837

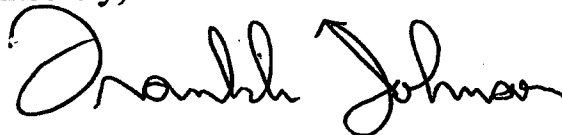
Subj.: Bayonne Barrel & Drum Superfund Site.

Dear Sir:

Clarkson & Ford Company only bought reconditioned 55 gallon closed head drums from Bayonne Barrel and did not send our drums in to be reconditioned. We feel that we should not be a party to any clean up action but we are answering the questions to the best of our ability.

Clarkson & Ford Co. is a small lubricating oil business with only five employees at the time in question. We buy reconditioned drums from several suppliers and resell them filled with pure lubricating oil to industrial customers. We do not have a license to be a collector of waste oil and will not touch any drum that had waste oil in it but will take back our drum that is empty of our product. We then clean and reuse those drums ourselves.

Sincerely,



Franklin T. Johnson
President
Clarkson & Ford Company

cc:
Marc Seidenberg, Esq.

466682



Enclosure - Answer to Questions.

1. Clarkson and Ford Company
New York Corporation
President and Chairman of the Board Franklin T. Johnson
41 Lake End Road
Greenpond, NJ 07435
Parent Company with no subsidiaries or affiliates
Established 1883
2. Clarkson & Ford Co. bought reconditioned drums but did not dispose nor store drums with Bayonne Barrel & Drum. This company never had any contract or agreement with Bayonne Barrel but did buy approximately 400 reconditioned, closed head, 55 gallon drums per year during the last years of their operation. We also buy new 55 gallon drums. Clarkson & Ford has no documentation remaining concerning any transactions as we dispose of that type of paperwork after seven years. We provide lubricants to industrial customers. Our products do not fit the criteria for hazardous or industrial waste as set out in your letter. We do not generate waste products in our operation. We do not have a need to dispose of waste products. The products we provide are petroleum oils of various viscosities. Most are supplied by the Exxon Company.
3. The only other person working here during that time is Alfred Johnson, Vice President, 238 Alpine Trail, Sparta, NJ 07871, 201-729-7132.
4. Alfred Johnson
5. Our insurance does not cover us for spills etc..
6. Not applicable.
7. Some of our drums might have been picked up by waste haulers and gotten to Bayonne Barrel but they were not under our control.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey

County of Bergen

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Franklin T Johnson
NAME (print or type)

President
TITLE (print or type)

Franklin T Johnson
SIGNATURE

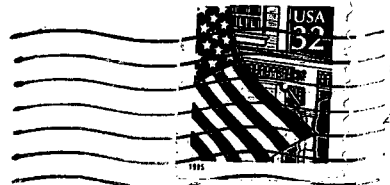
Sworn to me before this
30th day of October, 1995

Sheila Carluccio
Notary Public

SHEILA CARLUCCIO
A Notary Public of New Jersey
My Commission Expires November 10, 1998

CLARKSON & FORD COMPANY

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CLIFTON, NEW JERSEY 07012



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